

# IAMP Area Action Plan

## Sustainability Appraisal Addendum of Proposed Post Examination Modifications

On behalf of **South Tyneside Council and Sunderland City Council**



South Tyneside Council



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# 1 Introduction

## 1.1 Background

- 1.1.1 Peter Brett Associates LLP (PBA) has been commissioned by Sunderland City Council (SCC) & South Tyneside Council (STC) to prepare this Addendum to the Sustainability Appraisal (SA) of the International Advanced Manufacturing Park Area Action Plan ('the IAMP AAP').
- 1.1.2 The purpose of this SA Addendum is to consider whether post examination modifications now proposed to the IAMP AAP would affect previous SA conclusions in relation to the emerging IAMP AAP and in particular would result in any new or different likely significant effects being identified. This SA Addendum must therefore be read in conjunction with the Publication Draft IAMP AAP SA Report (Updated) (August 2016) and the IAMP AAP SA – Post Publication Draft Consultation Addendum (February 2017), both of which were prepared by Ove Arup & Partners Ltd on behalf of SCC and STC.

## 1.2 SA Process for the Emerging IAMP AAP

- 1.2.1 In accordance with statutory requirements, a SA incorporating Strategic Environmental Assessment (SEA) has been undertaken for all stages of the emerging IAMP AAP. This includes:
- Publication Draft IAMP AAP SA Report (Updated) (August 2016) was consulted on in tandem with the Publication Draft IAMP AAP; and,
  - IAMP AAP SA – Post Publication Draft Consultation Addendum (February 2017) accompanied the version of the IAMP AAP which was submitted to the Planning Inspectorate at the commencement of the IAMP AAP Examination in Public (EiP).
- 1.2.2 This SA Addendum will similarly accompany public consultation on post-examination modifications to the IAMP AAP. This SA Addendum complements but does not supersede the Publication Draft IAMP AAP SA Report (Updated) (August 2016). The baseline analysis, policy review sections and contextual information provided within that SA report are considered to remain valid for the purposes of undertaking this SA and do not require to be updated within this SA Addendum.
- 1.2.3 In preparing the emerging IAMP AAP, both SCC and STC have had regard to and duly complied with the Duty to Co-operate with neighbouring authorities. Evidence to demonstrate compliance with all relevant statutory requirement was provided to the Inspector appointed by the Secretary of State to undertake the EiP of the Proposed Submission IAMP AAP prior to the commencement of the EiP. The Inspector, having completed the EiP, has now indicated that the Proposed Submission IAMP AAP requires a number of modifications to enhance its soundness, whilst SCC and STC have also proposed a number of modifications to clarify aspects of the IAMP AAP.

## 1.3 Purpose of this SA Addendum

- 1.3.1 This SA Addendum builds upon previous SA work undertaken for the IAMP AAP and has been underpinned by the same SA Framework set out within the Publication Draft IAMP AAP SA Report (Updated) (August 2016). PBA have reviewed this SA Framework, provided in Appendix A, and consider that it remains suitable for use in assessing the sustainability effects of the IAMP AAP. The same SA Framework has therefore been applied without modification to assess the significance of any new or different effects resulting from the modifications now proposed to the IAMP AAP.

- 1.3.2 A draft of this Addendum was first provided to SCC and STC on 25<sup>th</sup> August 2017, following which clarifications were provided and suitable revisions proposed by SCC and STC to address identified significant adverse effects on landscape and biodiversity interests. These revisions result in no significant adverse effects now being predicted to result from the proposed modifications. The SA Addendum has been updated to respond to the revisions to the proposed modifications.

## 2 Screening and Appraisal of Proposed Modifications

### 2.1 Introduction

2.1.1 This section presents a screening and appraisal of all proposed modifications against the SA Framework, detailed in Table 2.1 below. The purpose of this exercise is to determine whether each modification (MM<sup>1</sup>) would result in any new or different likely significant sustainability or environmental effects from those previously assessed within the SA of the Revised Proposed Submission IAMP AAP (September 2016).

2.1.2 The screening detailed in Table 2.1 includes the following information for each MM:

- Main Modifications and Proposed Submission IAMP AAP reference numbers - to identify each modification and the affected component(s) of the IAMP AAP as submitted for EiP (February 2017);
- Summary of MM - to describe what each modification would change within the IAMP AAP as submitted for EiP (February 2017);
- Predicted Effects - consideration of what effects (in sustainability, environmental and wider terms) the MM would be likely to generate, taking account of the effects identified through previous rounds of SA reporting; and,
- Significance of Predicted Effects – consideration of whether the identified effect(s) of the MM would result in any new or different likely significant effect compared with those reported previously.

2.1.3 Where significant adverse effects are considered likely to occur as a result of the proposed modifications, the commentary column of Table 2.1 identifies suitable mitigation to reduce the level of adverse effects to a not significant level. All required mitigation has been agreed with SCC and STC, meaning that the modifications now proposed are not considered likely to result in any significant adverse effects.

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<sup>1</sup> Based on advice provided by the Examination Inspector that all proposed modifications require to be subject to SA, SCC and STC propose to consult on all modifications as 'main modifications' rather than identifying the less substantive ones as 'additional' or 'minor' modifications.

Table 2.1 SA Screening of IAMP AAP Post Examination Proposed Modifications

MM Ref	Summary of MM	Predicted Effects	New or Different Likely Significant Effects?
MM1	Cover image updated, clarifying plan period and document.	There is no relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM2	Foreword included to set the context for IAMP, including details of floor space, site size and potential jobs creation.	There is no relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM3	Updated headers for adopted version	There is no relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM4	Updated for consistency with adopted version.	There is no relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM5	Remove glossary at front	There is no relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM6	Revised text due to typographical error.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM7	Clarity provided on location of manufacturing plant geographically and in terms of administrative areas.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM8	Revised text for clarity to establish document as policy framework for employment site development.	The effect of this MM would be to clarify the status of the IAMP AAP as a policy framework within the statutory adopted Development Plan. This clarifies the weight to be afforded to the IAMP AAP, including policy and design requirements therein which relate to a range of sustainability issues.	None predicted.

		There is however no clear relationship between this MM itself and the SA Framework. The MM would therefore have no clear effects.	
MM9	Error in text revised for clarity and inclusion of City Deal in text.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM10	Text revised to indicate plan period.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM11	Text revised to reflect sites position within a designated Nationally Significant Infrastructure Project (NSIP) area, to be implemented by Development Consent Order (DCO). Text also revised to note that the IAMP AAP is a policy framework for use in assessing all development proposals within the IAMP boundary area.	<p>The effect of these MMs would be to confirm that the IAMP is a proposed development within a designated NSIP boundary for a DCO, rather than requiring a single DCO application to be submitted by SC and STC for the whole boundary area. This clarification would both provide increased flexibility through enabling multiple / phased applications within the boundary area to be submitted by a range of actors (not solely IAMP LLP). In tandem it would confirm the applicability of the IAMP AAP as a relevant policy framework for assessing any such applications.</p> <p>These MMs would therefore clarify the scope of the IAMP and the status and applicability of the IAMP AAP, including policy requirements therein which relate to a range of sustainability issues. The MMs would therefore support the implementation of the IAMP AAP.</p>	These MMs would only amend supporting text rather than policy requirements and there is no clear relationship between these MMs themselves and the SA Framework. The MMs would therefore have no clear effects, although they would enhance the implementation of the IAMP as a policy framework of relevance to the determination of applications.
MM12			
MM13	Superseded text deleted.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM14			
MM15	Increase in floorspace specified from 260,000 sq. m to 392,000 sq. m. Principal uses defined for clarity as production,	This MM would set out updated development quantum limits and specifications, reflecting the increased size of developable area (100 ha to 150	The confirmation of updated development quantum limits, development specifications and acceptable principle



	supply chain and distribution activities relating to Automotive and Advanced Manufacturing.	<p>ha through removal of land safeguarding). This may provide enhanced flexibility through allowing a suitable range of development to be brought forward across the site.</p> <p>Confirmation of the Principal Uses which will be acceptable within the IAMP AAP area would enhance clarity for applicants and decision makers alike, whilst providing a degree of flexibility compared with the previous fixed list of acceptable uses.</p>	<p>uses within supporting text would indirectly contribute to the creation of high value employment opportunities and economic growth. This would result in a Minor but Not Significant Positive effect on SA objectives 8 and 9.</p> <p>The policy protection afforded to the NELSAM would help to protect and enhance heritage assets, resulting in a Minor but Not Significant Positive effect on SA objective 12.</p>
MM16	Text inserted for clarity	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM17	Revised text to explain policy map.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM18	Revised text, renaming commercial, leisure and transport “local centre” to “area”. Removes qualification of “extensive” where describing the ecological and landscape mitigation zone.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM19	Grammatical changes, and inclusion of ‘England’ in describing extent of success of the automotive and advanced manufacturing industry.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM20	Grammatical changes describing Nissan’s contribution to local economy.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM21	Grammatical change for clarity.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.

MM22	Text deleted regarding project details for clarity.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM23	Grammatical changes and further details of Nissan's products delivered at Sunderland.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM24	Sentence case changed.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM25	Additional text "of England" added when describing regions (i.e. North East).	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM26	Revision to City Deal name and revision to text of objectives.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM27	Grammar and correction of Local Authority name.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM28	Text added for clarity.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM29	Text included to acknowledge Grade II listed structure (Hylton Grove Bridge) in the vicinity of the site. Social infrastructure (2.5 ha of playing fields at local museums) also identified.	As detailed previously within the IAMP AAP SA – Post Publication Draft Consultation Addendum (February 2017), this MM has been agreed with Historic England and has already been subject to SA. The MM would introduce specific reference to Grade II listed structure (Hylton Grove Bridge), museums and playing fields.  As a change to contextual information within supporting text this MM would have no specific effect. However, it would enhance the implementation of policies within the IAMP AAP	None predicted.

		which set out criteria to protect and enhance heritage and greenspace assets.	
MM30	Grammatical change.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM31	Text revised to reflect sites position within a designated NSIP area, to be implemented by DCO. Text also revised to note that the IAMP AAP is a policy framework for use in assessing all development proposals within the IAMP boundary area.	The effect of these MMs would be to confirm that the IAMP is a proposed development within a designated boundary for a DCO, rather than requiring a single DCO application to be submitted by IAMP LLP for the whole boundary area. This clarification would both provide increased flexibility through enabling multiple / phased applications within the boundary area to be submitted by a range of actors (not solely IAMP LLP). In tandem it would confirm the applicability of the IAMP AAP as a relevant policy framework for assessing any such applications.  These MMs would therefore clarify the scope of the IAMP and the status and applicability of the IAMP AAP, including policy requirements therein which relate to a range of sustainability issues. The MMs would therefore support the implementation of the IAMP AAP.	These MM would only amend supporting text rather than policy requirements and there is no clear relationship between the MM itself and the SA Framework. The MMs would therefore have no clear effects, although they would enhance the implementation of the IAMP as a policy framework of relevance to the determination of applications.
MM32			
MM33	Grammatical change.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM34	Sentences removed for clarity.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM35		Whilst MM35 relates to the removal of reference to previous land safeguarding from the IAMP AAP,	None predicted.

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		this MM would only change supporting text and would have no clear effects.	
MM36	Revisions clarifying name and status of Local Plan documents.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have not clear effects.	None predicted.
MM37	Text added to reflect updates to Sunderland's Local Plan, with Core Strategy and Development Plan approved by Cabinet in July for consultation.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM38	Text removed to reflect updates to Sunderland's Local Plan.	The effect of these MMs is to provide a more up-to-date policy context on the relationship between this AAP and other parts of the development plan for SCC and STC..	No effect is predicted
MM39			
MM40			
MM41	Grammatical changes for clarity.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM42	Grammatical changes for clarity.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM43	Grammatical changes for clarity and consistency.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM44	Grammatical changes and nomenclature changes for clarity and to reflect status in Local Plan	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM45	Grammatical changes	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM46	Changes to nomenclature	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.

MM47	Change to web address.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM48	Tense change.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM49	Changes to sentence case.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM50	Grammatical changes.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM51	Emphasis on 'regional' approach rather than 'city regional'.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM52	Change in nomenclature--"City Deal" rather than "Sunderland City Deal"	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM53	Change to sentence structure and tense.	This MM would clarify that the Duty to Co-operate has been fulfilled in preparing the IAMP AAP, which would enhance its soundness. As a contextual change to supporting text, no specific effects on any the sustainability objectives are predicted.	None predicted.
MM54	Revised text refers reader to Statement of Consultation.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM55			
MM56			
MM57			

MM58	Inserted "Alternative" in section title.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM59	Removes supporting text relating to safeguarded land and its potential future release.	<p>These MMs would amend supporting text to clarify that the IAMP policies would now release the full 150ha IAMP boundary area from the Green Belt without designating any safeguarded land. Whilst there is no change to the total extent of land released from the Green Belt, the previous proposal to designate 50ha of safeguarded land would have prevented this land from being released from development prior to a plan review, whereas the land would now be available for development in the short term.</p> <p>The main effect of removing the safeguarding status of 50ha of land within the IAMP boundary area would be to increase the developable area within the short term. This would enhance the delivery of development for employment purposes, resulting in positive effects on SA objectives 7 and 8.</p> <p>The removal of the previously proposed land safeguarding would indirectly weaken Green Belt protection, as it would effectively remove an extensive temporary buffer that would have otherwise been in place (until a future plan review) between the IAMP developable area and the retained Green Belt boundary. Compared with the assessment of effects on the Green Belt provided in the Publication Draft IAMP AAP SA Report (Updated) (August 2016), this could have a negative effect on the integrity of the Green Belt along the boundary between the IAMP and the retained Green Belt. However, any adverse effects</p>	<p>These MMs would only amend supporting text and would not themselves alter Green Belt boundaries or associated policy criteria. The MMs would therefore have no significant effects.</p>
MM60	Removes text referring to the potential release of Green Belt land over the next 15 years.		
MM61	Some grammatical changes and removing references to maintaining the Green Belt beyond the development of the AAP. This reflects an increase allocation of development land.		

		would be mitigated by Green Belt related policy requirements set out in the modified version of Policy S1.	
MM62	Correction in text, stating the correct number of NSIPs in the area.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM63	Text revised to reflect sites position within a designated NSIP area, to be implemented by DCO.	The effect of this MM would be to confirm that the IAMP is a proposed development within a designated boundary for a DCO, rather than requiring a single DCO application to be submitted by IAMP LLP for the whole boundary area. This clarification would both provide increased flexibility through enabling multiple / phased applications within the boundary area to be submitted by a range of actors (not solely IAMP LLP). In tandem it would confirm the applicability of the IAMP AAP as a relevant policy framework for assessing any such applications.	This MM would only amend supporting text rather than policy requirements and there is no clear relationship between the MM itself and the SA Framework. The MM would therefore have no clear effects, although it would enhance the implementation of the IAMP as a policy framework of relevance to the determination of applications.
MM64	Inserts text relating to Testos DCO submission date to reflect changing circumstances.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM65	Updates text regarding submission of Downhill Lane submission date to reflect changing circumstances.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM66	Text added/deleted for clarity on purpose of the AAP.	This MM to supporting text would clarify the status of the IAMP AAP as a policy framework. Whilst this would have no specific effects on the SA objectives, it would enhance the implementation of the IAMP AAP in the determination of relevant applications.	None predicted.
MM67	Reference to Design Code removed.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.

MM68	Clarification of location of proposals within NSIP boundary.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM69	Explanatory text removes reference to proposed floorspace. Reference to strategic policies in the AAP regarding the integration of the Nissan Plant and Enterprise Zone are removed.  Further text is added to qualify that the 135ha is retained within the AAP area to accommodate “some” of the environmental mitigation required for loss of biodiversity within the site.	This modification merely amends supporting text to correspond with proposed modifications to Policy S1 and the removal of S2.	As this MM would only amend supporting text rather than policy requirements, no significant effects on any SA objectives are predicted.
MM70	“Spatial Strategy” added to text for clarity.	This MM would itself have no clear effects.	None predicted.
MM71	Text added to reflect purpose of the spatial strategy and AAP Policies Map.	This MM to supporting text would clarify the role and status (as a framework) of maps provided within the IAMP AAP. The maps could therefore be used in the determination of relevant applications. This MM would therefore enhance the implementation of the IAMP AAP but would have no specific effects on the SA objectives.	None predicted.
MM72	Multiple changes to Policy S1: Spatial Strategy for Comprehensive Development  Revised IAMP land allocation, with 150 ha of land now proposed to be released from the Green Belt without designating any safeguarded land. Whilst there is no change to the total extent of land released from the Green Belt, the previous proposal to designate 50ha of safeguarded land would have prevented this land from being released from development prior to a plan	This MM would: <ul style="list-style-type: none"> <li>- Increase the developable area within the short term. This would enhance the delivery of development for employment purposes, resulting in positive effects on SA objectives 7 and 8.</li> <li>- Effectively remove a temporary buffer that would have otherwise been in place (until a future plan review) between the IAMP developable area and the retained Green Belt boundary.</li> </ul>	This MM would change policy rather than supporting text and has the potential to result in a range of sustainability effects. The significance of these effects is examined in detail within Section 3.



	<p>review, whereas the land would now be available for development in the short term.</p> <p>Text inserted to clarify that 110ha of the land will be Ecological and Landscape Mitigation Areas (ELMA) as compensation for adverse ecological impacts and to mitigate adverse landscape impacts from development within the IAMP boundary area.</p> <p>Further stipulations added to ensure development meet the objectives of the AAP and will not prejudice comprehensive development of the IAMP, that it relates well to the existing employment area and Enterprise Zone and established infrastructure, to providing for the mitigation required for the IAMP, including environmental mitigation, and is capable of being implemented without breaching the provisions of the Planning Act 2008.</p>	<ul style="list-style-type: none"> <li>- Remove the need for a single DCO application to be submitted for development within the IAMP boundary area. This would increase flexibility and could support a range of development proposals consistent with the requirements of Policy S1 to be brought forward, resulting in the creation of high value employment opportunities and economic growth. A positive effect on SA objectives 7 and 8 is therefore predicted. Confirm the full release of 150ha from the Green Belt, with no land safeguarded for future consideration. This could have a range of potential sustainability effects, as discussed further in Section 3.</li> <li>- Confirm the extent and position of the ELMA. This would ensure the provision of sufficient appropriately located ecological compensation and landscape mitigation (on a 'worst-case' basis) as a policy requirement, resulting in positive effects on SA objectives 3 – 5.</li> </ul>	
MM73	Text revised to account for 150 ha of land being released from the Green Belt for development. Text also inserted to identify and safeguard museum and playing field assets.	This MM indicates the planned retention of the North East Land, Sea and Air Museum (NELSAM) within the IAMP boundary area and confirms the safeguarding (unless deemed surplus to requirements) of playing fields, including a requirement for re-provision if needed for development.	By protecting playing fields provision the MM would have a Positive and Significant effect on physical recreation opportunities and health outcomes, resulting in a new Positive and Significant effect for the purposes of the IAMP AAP Health Impact Assessment as well as in SA terms.
MM74	Deletion of text to account to reflect amendment to allocate 150ha of employment land and no longer safeguard land.	These MMs would amend supporting text to clarify that the IAMP policies would now release the full 150ha IAMP boundary area from the Green Belt. This would enhance the delivery of development for	These MM would only amend supporting text rather than policy requirements and there is no clear relationship between the
MM75			

		<p>employment purposes in the short term, resulting in a positive effect on SA objectives 7 and 8.</p> <p>These MM would also however indirectly weaken Green Belt protection through removing the short term protection against development previously proposed to be afforded by the safeguarded area, and it could adversely affect the integrity of new Green Belt boundaries between the IAMP site and adjacent retained Green Belt land, resulting in a potential adverse effect on SA objective 5. However, these adverse effects are mitigated by Green Belt related policy requirements set out in Policy S1 and the formal designation of a 110ha Ecological and Landscape Mitigation Area (ELMA).</p>	<p>MM itself and the SA Framework. The MM would therefore have no clear effects. An assessment of the substantive effects of the removal of 50ha land from safeguarded status is provided in Section 3.</p>
MM76	Grammatical change to lower case lettering.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM77	Grammatical change	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM78	Grammatical change	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
M79	Text added to describe the ELMA in the context of Policy S1.	This MM would confirm the extent and position of the ELMA. This would ensure the provision of sufficient appropriately located ecological compensation and landscape mitigation (on a 'worst-case' basis) as a policy requirement, resulting in positive effects on SA objectives 3 – 5.	This MM has the potential to result in a range of sustainability effects, the significance of which is examined in detail within Section 3. The MM would only amend supporting text and therefore would not result in significant effects, although it would contribute to the implementation of ELMA requirements within Policy S1.

MM80	Proposed removal of Policy S2 – Green Belt and Safeguarded Land. This MM reflects the proposed removal of safeguarded land status.	<p>This consequential MM results from the removal of safeguarded status from 50ha land within the IAMP boundary area, such that Policy S1 as modified would release 150ha from the Green Belt without any land being safeguarded. This removes the need for assessment criteria relating to the future release of safeguarded land and thus makes Policy S2 as previously drafted redundant.</p> <p>The full release of 150ha from the Green Belt with no safeguarding land would enhance the delivery of development for employment purposes in the short term, resulting in a positive effect on SA objectives 7 and 8. It would also however indirectly weaken Green Belt protection through removing the short term protection against development previously proposed to be afforded by the safeguarded area, and it could adversely affect the integrity of new Green Belt boundaries between the IAMP site and adjacent retained Green Belt land, resulting in a potential adverse effect on SA objective 5. However, these adverse effects are mitigated by Green Belt related policy requirements set out in Policy S1 as modified and the formal designation of a 110ha Ecological and Landscape Mitigation Area (ELMA).</p>	This MM would amend policy rather than supporting text and has the potential to result in a range of sustainability effects. The significance of these effects is examined in detail within Section 3.
MM81	Removal of explanatory text to reflect the proposed removal of safeguarded land status from 50ha land within the IAMP boundary area.	This consequential MM to explanatory text results from the proposed removal of safeguarded status from 50ha of land within the IAMP boundary area and the proposed removal of Policy S2. The proposed removal of this explanatory text would itself have no clear effects.	This MM would only amend supporting text and would itself have no clear sustainability effects. An assessment of the substantive effects of the removal of 50ha land from safeguarded status is however provided in Section 3.
MM82	Revision of Policy S2 ('Land Uses', previous Policy 3) to clarify the scale and quantum of development supporting uses	The rewording of the policy emphasises the principal uses of the IAMP for activities related to the Automotive and Advanced Manufacturing	The modification would strengthen Policy S1 insofar as land uses are regulated by the IAMP 'Spatial Strategy'. It provides

	<p>in the IAMP. Text is inserted requiring the DCO to contain requirements for ongoing permitted uses, or otherwise provides for Article 4 Direction.</p> <p>Introduction of text regarding the NELSAM, which will be retained as a visitor attraction.</p> <p>Introduction of text relating to the ELMA in support of policy S1.</p> <p>References to S5 'Ancillary Uses' is simplified in referring to additional</p>	<p>Centres, providing further policy support to Objectives 1 and 9. The requirement for a market demand analysis is removed.</p> <p>Introduction of revised paragraph C strengthens protection and enhancement of existing visitor attractions (NELSAM), in line with refined IAMP Site Masterplan Objectives.</p>	<p>further policy support for environmental mitigation through the ELMA.</p> <p>Policy support for retention and enhancement of visitor attractions would have a positive effect on SA objective 11 though in itself would not be significant.</p>
MM83	Punctuation change.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have not clear effects.	None predicted.
MM84	Word choice.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM85	Case change.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM86	Justification in the Commercial and Employment Background Report is removed and minimum floorspace requirements removed.	Clarification in supporting text to remove requirement of minimum floorspace.	None predicted.
MM87	Clarification reflecting provision for Article 4 Direction in Policy S2.	Cross-refers to policy and possibility that the Councils could consider the use of an Article 4 Direction to ensure continued use.	None predicted.
MM88	Rewording of sentence stating that the IAMP precludes residential development	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.

MM89	Revision of Policy S3  Renumbered policy (previous Policy S4) and revised text specifying increased amount of employment spaces for principal uses, both to reflect the removal of safeguarded land and Policy S2.	Policy S3 as modified would set out updated development quantum limits and specifications applicable within the IAMP boundary area, reflecting the increased size of developable area (100 ha to 150 ha through removal of land safeguarding). This may provide enhanced flexibility through allowing a suitable range of development to be brought forward across the site.	The confirmation of updated development quantum limits, development specifications and acceptable principle uses within supporting text would indirectly contribute to the creation of high value employment opportunities and economic growth. This would result in a Minor but Not Significant Positive effect on SA objectives 8 and 9.
MM90	Changes to provide clarity on supporting uses.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM91	Removes reference to the 'Strategic Employment Study' which set out the scale and quantum of uses.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM92	Grammatical changes.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM93	Deletion of Policies S5, S6 and supporting text, replaced with new and renumbered Policy S4.	Read together, these MM would consolidate assessment criteria into a single policy relating to the acceptability and design of ancillary development within 'The Hub' area. The revised criteria would clarify the extent, acceptable use and development quantum permitted within 'The Hub' area. This would allow appropriate ancillary development to come forward without undermining the high value employment focus of the IAMP proposal or the vitality and viability of existing centres.	Read together, these MM would have Minor Positive effects on SA 7 - 10 through clarifying the policy support given to economic activities and the creation of new employment opportunities that are compatible with the IAMP.  The Health & Equality Impact Assessments undertaken in August 2016 as part of the Publication Draft SA Report noted that Policy S4 (as now renumbered) would positively contribute to the employment, education provision and recreation uses. Additional facilities (hotel and other retail uses) will provide additional benefits. These MM would add
MM94			
MM95			
MM96			
MM97			
MM98			
MM99	Revision of Policy S4 (replacing previous policies S5 and S6)  This policy draws together and updates assessment criteria set in former Policy S5 and S6. Specifications for a Hotel (C1) and Gymnasium (D2) are included. Provision is		

	<p>also made for micro and start-up businesses. Ancillary facilities including nursery, childcare etc. and additional retail facilities are identified.</p> <p>Further provision is made for the protecting the vitality of existing retail facilities such that other ancillary uses would be permitted so long as they do not prejudice the Principal Uses of the IAMP or the vitality or viability of other designated retail centres.</p>		<p>further clarity but would not alter the health and equalities effects previously identified.</p>
MM100	Supporting text inserted outlining the purpose of including ancillary uses, details of the Hub particularly for the purposes of a transport interchange, and NPPF compliance.		
MM101			
MM102			
MM103			
MM104	Text removed referencing the opportunity for further expansion.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM105	Change to sentence case.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM106	<p>Paragraph added under 'Masterplan Objectives' referring to preserving and enhancing heritage assets. Specifically refers to Hylton Grove Bridge and its setting within the River Don Corridor.</p> <p>Sets our requirements for desk-based assessments and programmes of archaeological fieldwork and necessary measures to protect remains in line with</p>	<p>This MM would introduce specific protection for heritage assets and their setting.</p>	<p>The specific protection afforded to heritage assets and their setting would result in a Major Positive and Significant effect on SA objective 11.</p>

	historic environment policies in adopted Local Development Plans.		
MM107	Changes to nomenclature.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM108	Policy D1 – Masterplan Design.  Grammatical changes to Policy, in addition to rewording provisions regarding preserving and enhancing the significance of heritage assets. Provision relating to compliance to Design Code is reworded.	This MM would insert policy requirements relating to the protection of heritage assets and the NELSAM, which would safeguard heritage interests.	The additional policy protection afforded to heritage interests would have a Major and Significant Positive effect on SA objective 11.
MM109	Grammatical change	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM110	Policy D2: Public Realm  Policy revision removes reference to “landscape” in policy. Requirement added that public realm strategy accompanies all development proposals in addition to DCO. Reference to Hub added with respect to location of street furniture and landmarks.  Reference removed to Design Code submitted as part of DCO.	Clarifications added to reflect changing circumstances (i.e. that applications may be considered in the IAMP under the Town and Country Planning Act). The Health Impact Assessment conducted in 2016 noted the compatibility of health and well-being sustainability objectives and high quality public realm and leisure/recreation uses. No additional policy provisions are proposed, so no new effects are predicted.	None predicted.
MM111	Supporting text referring to “landscape” removed.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM112	Text added for clarity.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.

MM113	<p>Revisions to policy T1 reflect change to nomenclature (reference to “Northern Employment area”) and application of policies to all development proposals.</p> <p>Part (B) of the Policy requires developments to provide a Transport Assessment to assess what improvements are required to make proposals acceptable in planning terms and to ensure deliverability of the IAMP.</p> <p>Developments are also required to provide a detailed Travel Plan.</p> <p>It is further noted that any developments that compromise the site development as a whole will not be supported.</p>	<p>This MM would introduce more stringent transport information and assessment requirements to accompany applications within the IAMP boundary area. This would ensure that all likely effects on the transport network are identified and addressed. The introduction of criteria D(iii) also requires cumulative impacts to be considered so that the full IAMP proposal can be delivered. discouraging single occupancy car use, encouraging car-sharing, etc.)</p>	<p>This MM would enhance the policy protection given to the functioning of the transport network, resulting in a Major Positive and Significant effect on SA objectives 12 and 13.</p>
MM114	Grammar change within explanatory text.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM115	Grammatical change.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM116	Grammar change within explanatory text.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM117	Grammatical change.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM118	Grammatical change.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.



MM119	Text inserted regarding requirements for travel plans to support sustainable transport methods indicated in Policy T2-4 during construction and operation of the IAMP	This MM would introduce more stringent transport information and assessment requirements to accompany applications within the IAMP boundary area. This would ensure that all likely effects on the transport network are identified and addressed	This MM would enhance the policy protection given to the functioning of the transport network, resulting in a Major Positive and Significant effect on SA objectives 12 and 13.
MM120	<p>Policy T2: Walking, cycling and horse riding</p> <p>Grammatical changes.</p> <p>Amendment to A, ii, with text inserted referring to the “needs of all types of users”. Reference also made in (A) to safely integrating cycle and pedestrian movements.</p> <p>Removal of policy protection for a pedestrian/cycle link over the A19 to connect the IAMP with the local network.</p> <p>Removal of text requiring that consent is only granted where adequate sustainable transport measures and bridleways provided, as provided in Design Code.</p>	This MM would introduce a need for applicants to consider the transport requirements of all road users, which could indirectly support the uptake of sustainable and active travel modes. The MM would however also remove the previous requirement to provide a pedestrian/cycle link over the A19, which could result in severance.	On balance, the consideration provided by this MM to meeting all transport needs would have a Minor Positive and Not Significant effect on SA objective 13.
MM121	Grammatical Change	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM122	Grammatical Change	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM123	<p>Policy T3: Public Transport</p> <p>Revision to policy refers to supporting “sustainable transport”. Additional text</p>	Policy revisions provide clarity on key connections within the transport network. Whilst this provides an indication of which centres/interchanges are likely to benefit, it would not result in any clear effects.	None predicted.

	added regarding Heworth and Sunderland multi-modal transport interchanges; and Hebburn, Jarrow, South Shields and Washington Centres.		
MM124	Grammatical change.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM125	Clarification provided over listed bridge— name included.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM126	Policy T4: Parking  Policy revisions removes reference to DCO. Clarifications in text provided, but no substantive changes to Policy.	The effect of this MM would be to standardise parking requirements with existing SCC and STC parking standards. This clarification would aid the implementation of the IAMP AAP in the context of the wider planning policy framework, but is not likely to have any effects on the sustainability objectives.	None predicted.
MM127	Grammatical change	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM128	Policy IN1: Infrastructure Provision  Reference to provisions for development under policies S1 and DEL2 moved to (A). Policy includes provision for connections made outwith AAP boundary. Reference to Design Code in context of DCO removed.	These MMs clarify the delivery of potential utility infrastructure requirements associated with the IAMP, but there is no clear relationship with the SA Framework and no clear effects are predicted.	None predicted.
MM129	Change to nomenclature and grammatical changes.		
MM130	Grammatical change.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.

MM131	Grammatical changes to Policy IN2: Flood Risk and Drainage. There is emphasis on encouraging opportunities to reduce flood risk.	This MM would introduce a requirement for SUDS to provide multi-functional benefits, which would enhance biodiversity and green infrastructure provision.	This MM would directly enhance biodiversity features and green infrastructure networks, resulting in a Major Positive and Significant effect on SA objectives 3 – 5. By improving the quality of the environment the MM could also have an indirect Minor Positive and Not Significant effect on SA objective 10. This would represent a new positive health effect from those previously assessed within the HIA provided in the Publication Draft SA Report (August 2016).
MM132	Change removes the requirement that flood risk assessments are completed as part of the DCO application only.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM133	Removes the requirement that a drainage strategy is submitted with the DCO.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM134	Change in terminology to describe river crossing.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM135	Syntax.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM136	Policy EN1: Landscape Policy revised to remove landscape buffer thresholds and rather prescribes that buffer is “appropriate”. Policy revision includes reference to “development proposals” rather than single	The main effect of this MM would be to replace a minimum distance based landscape buffer threshold and instead require the provision of an “appropriate” buffer. This could both enhance flexibility and landscape protection by requiring the proposed buffer to be appropriate in relation to specific development proposals, which may vary across the IAMP boundary area.	In the absence of an objective definition of “appropriate”, the extent of buffer required could be contested between an applicant and other stakeholders. At the same time however, this MM would allow SCC, STC and any Inspector appointed to determine a DCO application for the IAMP to determine on a case by case

	DCO. Details of landscape buffer is removed. Reference included to ELMA as “focus” for primary landscape mitigation.	Other revisions to this policy would emphasise that mitigation should be focused in the ELMA, as per Policy S1.	basis what landscape buffer would be appropriate in the context of a specific development proposal. It is assumed that the requirement to provide an appropriate landscape buffer would therefore not undermine the integrity of Green Belt boundaries. This MM could however indirectly support economic growth and employment creation by increasing flexibility regarding the use of developable land within the IAMP boundary area. As such the MM would have Neutral effects on SA objectives 3 and 5 and Minor Positive effects on SA objectives 7 and 8.
MM137	Clarification added to text. No substantive change.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM138	Grammatical change	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM139	Change to nomenclature and grammatical change	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.

MM140	<p>Policy EN2: Ecology</p> <p>Revisions to policy criteria to ensure that biodiversity interests (including the water environment of the River Don) are protected, maintained and enhanced as appropriate. The revisions also focus mitigation measures on the ELMA in line with Policy S1 and require consideration of impact prevention and mitigation before compensatory measures are proposed.</p>	<p>This MM would expand the coverage of Policy EN2 to address biodiversity protection and enhancement, not merely maintenance, whilst also prioritising impact prevention and mitigation ahead of compensatory measures where feasible. At the same time, the policy acknowledges that mitigation should be focused on the ELMA given the nature of development proposed across the IAMP developable area. This accords with the NPPF (paragraph 118) and would directly strengthen the application of the policy, resulting in a Minor Positive effect on SA objective 4.</p>	<p>This MM was amended following the draft SA Addendum to ensure the avoidance of significant adverse effects on biodiversity interests and to align Policy EN2 with paragraph 118 of the NPPF (2012).</p> <p>The clear and strengthened policy tests introduced by this MM would ensure that Policy EN2 provides appropriate protection for biodiversity interests. This would enhance the effectiveness of the IAMP AAP but would not result in new or different significant effects from those previously assessed. .</p>
MM141	Grammatical Change	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM142	Explanatory text to define “ <i>biodiversity</i> ” interests.	This MM would clarify that a wide scope of biodiversity interests should be considered in relation to Policy EN2. This would aid the implementation of Policy EN2 but would itself not result in any new or different effects from those previously identified in relation to Policy EN2.	None predicted.
MM143	Sentence restructuring.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.

MM144	Inserts supporting text to clarify that a sequential process should be followed to implement an ecological mitigation hierarchy through the EIA process	As with MM140, this MM would prioritise ecological impact prevention and mitigation ahead of compensatory measures where feasible. This would enhance the conformity of the IAMP AAP with the NPPF (paragraph 118) and would indirectly strengthen the application of Policy EN2, resulting in a Minor Positive effect on SA objective 4.	This MM was amended following the draft SA Addendum to ensure the avoidance of significant adverse effects on biodiversity interests and to align Policy EN2 and supporting text with paragraph 118 of the NPPF (2012).  The MM provides clarity regarding the implementation of an ecological mitigation hierarchy and associated criteria within Policy EN2, but as the MM relates to supporting text only it would not result in new or different significant effects from those previously assessed.
MM145	Grammatical change	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM146	Grammatical change	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM147	Revisions to supporting text removes references to environmental guidance and information. Further revision emphasises that all development proposals will require an EIA.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM148	Policy EN3 revised to specify that policy applies to “ <i>development</i> ” generally. It provides further detail on thresholds for development along the River Don.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM149	Grammar and changes to tense.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.

MM150	Removes sole reference to DCO with respect to delivering amenities.  Revision emphasises that any mitigation measures with respect to amenity will be secured either through DCO or planning obligations.	This MM relates to development and infrastructure delivery and would itself have no clear effects.	None predicted.
MM151	Grammatical change	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM152	Promoter of site is renamed “IAMP LLP” and grammar change.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM153			
MM154	Grammatical changes	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM155	Policy Del 1: Phasing and Implementation  Policy criteria amended to specify matters to be addressed in “ <i>any application</i> ”, as opposed to only a DCO application, within the IAMP boundary area. Revised text also emphasises the potential use of planning obligations to secure implementation.  Additional corrections to grammar.	These MM make minor changes to policy criteria which set out requirements for development phasing, including a need to demonstrate how strategic infrastructure will be delivered.	None predicted.
MM156		The effect of these MM would be to provide increased flexibility through enabling relevant matters to be address through multiple / phased applications, rather than only linking the IAMP AAP to a single DCO application. These MM therefore would therefore clarify the scope of the IAMP and support the implementation of the IAMP AAP. There is however no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	
MM157			

MM158	Reference is removed to the requirement for an EIA to ensure mitigation measures are implemented in line with an approved phasing plan.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM159	Grammatical change	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM160	Revision to Policy DEL2 with respect to securing mitigation. (B) reworded to note that mitigation could be achieved through a DCO, Planning conditions, or obligations as appropriate.	Changes to policy and supporting text reflect that additional applications in addition to a DCO may be required for site deliverability. This is likely to support the deliverability of the site by clarifying key aspects of policy and how mitigation would be achieved.  As with MM's 155 – 157, the effect of these MM would be to provide increased flexibility through enabling relevant matters to be address through multiple / phased applications, rather than only linking the IAMP AAP to a single DCO application.  These MM therefore would therefore clarify the scope of the IAMP and support the implementation of the IAMP AAP. There is however no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM161			
MM162			
MM163	Text removed relating to an infrastructure delivery plan and table as this forms part of a supplementary document.	Assuming infrastructure delivery is consistent with SA12-13 and with spatial strategies (S1), this is not likely to have a significant effect.	None predicted.
MM164			
MM165	Policy map updated.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.



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MM166	With regard to the Monitoring Framework, text inserted acknowledging that the Local Plan will achieve some of the key Sustainability Objectives.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM167	Text inserted regarding maximising opportunities for public sector and private sector funding.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM168	Cross references in Sustainability Table updated.	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM169	Replacement monitoring framework	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no clear effects.	None predicted.
MM170	Update to superseded policies	There is no clear relationship between this MM and the SA Framework. The MM would therefore have no- clear effects.	None predicted.
Sustainability Objectives and Policies	Updated Sustainability Objectives and Policies table.	The revised table cross-references policies and SA objectives only and is unlikely to have significant effects as it has no policy implications.	None predicted.
Monitoring Framework	Monitoring Framework has been prepared in accordance with SA guidance.	Monitoring Framework is unlikely to have significant effects as it has no policy implications.	None predicted.
Superseded Policies	Revised list of superseded policies inserted.	This is for reference only so will not affect SA objectives.	None predicted.

## 3 Sustainability Effects from the Removal of Policy S2 and 50HA Safeguarded Land Status Change

### 3.1 SA of MM72, MM80 and MM81

3.1.1 As noted in Section 2, MM72, MM80 and MM81 have the potential to result in a range of sustainability effects through removing the safeguarded status of 50ha of land adjacent to the proposed new Green Belt boundary. These effects are considered in detail within Table 3.2 below, using the key provided in Table 3.1. It should be noted that

Table 3.1 SA of Removal of Policy S 2 and 50HA Safeguarded Land Status - Key

Symbol	Predicted Effect
✓	Compatible
!	Direct Conflict
⚠	Potential Conflict
?	Dependent on Implementation
-	No / Insignificant Link

Table 3.2 SA of MM72, MM80 and MM81 – Appraisal Matrix

			Predicted Effect	Commentary
Environmental	1	Reduce the emissions of greenhouse gases within Sunderland and South Tyneside	?	The proposed modifications would not themselves impact the reduction of greenhouse gases or omissions. The provision of additional development land in the short term through removing the previously proposed safeguarded status from 50ha of land and the likely impact on commuting patterns would be dependent on the delivery of complementary policies to mitigate congestion and other adverse effects. The Publication Draft IAMP SA Report (August 2016) confirms that Policies T2-T4 would effectively mitigate increased congestion. The potential of these MMs to affect SA objective 1 is therefore uncertain and dependent on the implementation of these policies.
	2	Adapt to the impacts of climate change in Sunderland and South Tyneside	?	
	3	Protect our environmental assets and natural resources	?	These modifications would allow development to be brought forward in the previously safeguarded area, which could negatively impact biodiversity and other environmental assets within this land take. However, this would depend on policy implementation and characteristics of development proposals (including proposed modifications for other policies setting out compensatory mitigation requirements).  The IAMP AAP Environment and Ecology Technical Background Report (February 2017) notes the potential to integrate open space, parkland with ecological mitigation to provide health and recreation benefits and to improve the natural environment, to collaborate with the River Don Restoration, and to ensure SuDs provide wildlife benefits, potential for tree, scrub and wet woodland around features such as ponds. The Report demonstrates that sufficient ecological compensatory measures can be delivered within the 110ha ELMA to address ecological impacts likely to occur from the
	4	Conserve and enhance biodiversity	?	

			Predicted Effect	Commentary
				full development of the 150ha IAMP boundary area, including the land now proposed for release from safeguarding. On this basis, the modifications are not likely to result in a significant effect on SA objective 3.
5	Protect and enhance our Green Belt and green infrastructure			<p>These MM would now release the full 150ha IAMP boundary area from the Green Belt without designating any safeguarded land. Whilst there is no change to the total extent of land released from the Green Belt, the previous proposal to designate 50ha of safeguarded land would have prevented this land from being released from development prior to a plan review, whereas the land would now be available for development in the short term.</p> <p>The removal of the previously proposed land safeguarding would indirectly weaken Green Belt protection, as it would effectively remove an extensive temporary buffer that would have otherwise been in place (until a future plan review) between the IAMP developable area and the retained Green Belt boundary. Compared with the assessment of effects on the Green Belt provided in the Publication Draft IAMP AAP SA Report (Updated) (August 2016), this could have a negative effect on the integrity of the Green Belt along the boundary between the IAMP and the retained Green Belt. However, any adverse effects would be mitigated by Green Belt related policy requirements set out in the modified version of Policy S1.</p> <p>Assuming the successful and appropriate implementation of Policies EN1 and EN2, suitable boundary treatments would be provided to delineate the new Green Belt boundary, which the land now proposed for release from safeguarding status would border.</p> <p>The IAMP AAP Exceptional Circumstances for Releasing Land from the Green Belt Technical Background Report (Feb 2017) confirmed all options for release from the Green Belt would have adverse effects on the Green Belt. However, the scale of development was justified and there is potential to ensure permanency to Green Belt boundaries. The Background Report notes there are currently strong, defensible boundaries provided by the A19, existing roads to the south east, at the 'northern edge of the southern development plot / previously safeguarded land' following the River Don (a 50m buffer either side of the river which will remain in the Green Belt, i.e. at least a 100m buffer corridor). Furthermore, a new 'landscape buffer' is proposed along</p>

			Predicted Effect	Commentary
				<p>the south west to north west boundary which follows the route of pylons running across this area. The development of the Northern Employment Area is unlikely to adversely affect the permanency of these boundaries. As such, it is considered that there is sufficient protection for the Green Belt boundaries within Policy S1 and this would be unaffected by the release of the 50ha safeguarded land.</p> <p>The previous SA assessed this Policy as being in direct conflict with SA objective 5. No additional Green Belt land would be released by the MM, so given the mitigation measures which would be delivered through Policies S1, EN1 and EN2, it is unlikely that these modifications would exacerbate the previously identified conflict. No change to the effect previously identified is therefore predicted.</p>
	6	Support the efficient use of resources and minimise disposal of wastes to landfill	-	The assessed MMs would have no clear effect on this SA objective.
Economic	7	Facilitate economic growth at a local and regional scale	✓	These modifications would allow for immediate development of additional land in within the IAMP boundary. This would support increase delivery of employment floorspace in the short term, thereby facilitating additional employment/apprenticeships and local/regional economic growth.
	8	Increase the provision of diverse employment opportunities for all across Sunderland and South Tyneside	✓	There is currently strong demand for large floorspace industrial and employment developments within the SCC and STC areas, linked in part to the automotive supply chain for manufacturing at Nissan's existing plant. A lack of expansion space for high-tech automotive space is considered to be a key barrier to growth, so the provision of additional short term development land within the IAMP boundary area would increase opportunities for multiplier effects, including inward investment, opportunities for SMEs, increased demand for city centre retail services, and support employment opportunities. As such, the immediate provision of additional employment land within the IAMP boundary area would be likely to have a positive impact on skills and local employment rates, resulting in Major Positive and Significant effects on SA objectives 7 – 9.
	9	Increase opportunities for education and skills for all within Sunderland and South Tyneside	✓	
Social	10	Improve health and well-being of people and communities	-	Whilst additional short term development within the previously safeguarded land could impact upon requirements for ancillary development and infrastructure provision, it is not expected that this would alter the community and infrastructure uses already allocated within The Hub area. The release of the previously proposed safeguarded

			Predicted Effect	Commentary
				<p>land for short term development is also not anticipated to result in any specific effects on heritage assets.</p> <p>Short term development within the area previously proposed for safeguarding could, in the short term, increase congestion and pressure on the local transport network compared with traffic impacts which would otherwise occur over this time period. However, MM 113 - 126 would mitigate this through setting out enhanced transport information and assessment requirements to accompany applications within the AAP boundary area. Depending on policy implementation, this should ensure the avoidance of adverse effects on SA objectives 12 and 13 as a result of making the safeguarded land available for short term development.</p>

## 4 Summary of Significant Effects

### 4.1 Overview

- 4.1.1 The purpose of this SA Addendum is to consider whether post examination modifications now proposed to the IAMP AAP would affect previous SA conclusions in relation to the emerging IAMP AAP and in particular would result in any new or different likely significant effects from those previously identified.
- 4.1.2 Sections 2 and 3 of this SA Addendum have identified a number of likely significant effects from individual proposed modifications on specific sustainability objectives identified in the SA Framework (see Appendix A). The proposed modifications considered likely to result in significant effects are listed in Table 4.1 below for ease of identification.
- 4.1.3 A draft of this SA Addendum was first provided to SCC and STC 25<sup>th</sup> August 2017, following which revisions were made to several proposed modifications to address identified significant adverse effects. These revisions result in no significant adverse effects now being predicted to result from the proposed modifications. All of the predicted significant effects now identified would therefore be beneficial. No additional mitigation measures are therefore required under the terms of the SEA Regulations to avoid significant adverse effects arising from the implementation of the Revised Proposed IAMP AAP as modified by the proposed modifications.

Table 4.1 Schedule of Predicted Significant Effects

Modification Reference	Type of Significant Effect
MM72	Major Positive
MM73	Major Positive (including in relation to HIA as well as SA)
MM80	Major Positive
MM106	Major Positive
MM108	Major Positive
MM113	Major Positive
MM119	Major Positive
MM131	Major Positive (including in relation to HIA as well as SA)

## Appendix A IAMP AAP SA Framework

A.1.1 Table A.1 below sets out the Sustainability Appraisal (SA) Framework which has been used in all stages of the SA for the emerging IAMP AAP, including this this SA Addendum.

Table A.1 IAMP AAP SA Framework

	SA Objective	Supporting Questions
1	Reduce the emissions of greenhouse gases within Sunderland and South Tyneside	Will it help to deliver energy efficient and low carbon development? Will it reduce energy consumption? Will it increase renewable energy generation? Will it help to reduce greenhouse gas emissions?
2	Adapt to the impacts of climate change in Sunderland and South Tyneside	Will it reduce the risk of flooding and overheating?
3	Protect our environmental assets and natural resources	Will it contribute to protecting water resources and improve water quality? Will it positively contribute to air quality? Will it protect areas of high landscape value? Will it contribute to remediation of contaminated land?
4	Conserve and enhance biodiversity	Will it protect and/or improve biodiversity? Will it protect environmentally designated sites?
5	Protect and enhance our Green Belt and green infrastructure	Will it protect the openness and purposes of the Green Belt? Does it contribute to the redevelopment of previously developed land? Will it protect and/or enhance open space and outdoor sports provision?
6	Support the efficient use of resources and minimise disposal of wastes to landfill	Will it increase recycling and reuse? Will it reduce the quantity of wastes being sent to landfill?
Economic		



	SA Objective	Supporting Questions
7	Facilitate economic growth at a local and regional scale	Will it support existing expertise in emerging low carbon and new technology markets? Will it promote economic growth for Sunderland and South Tyneside? Will it offer opportunities for new business start-ups? Will it increase provision of office and employment space within Sunderland and South Tyneside?
8	Increase the provision of diverse employment opportunities for all across Sunderland and South Tyneside	Will it support employment markets in Sunderland and South Tyneside? Will it provide a range of employment opportunities appropriate for a wide range of skills?
9	Increase opportunities for education and skills for all within Sunderland and South Tyneside	Will it support training and education of people in Sunderland and South Tyneside from all communities? Will it promote equality of opportunity and access for all? Will it impact upon people who share a protected characteristic identified in the Equality Act 2010*?  <i>*(age, disability, gender reassignment, marriage &amp; civil partnership, pregnancy and maternity, race, religion, sex, sexual orientation)</i>
<b>Social</b>		
10	Improve health and well-being of people and communities	Will it help to increase life expectancy and reduce health inequalities? Will it help residents to choose healthy and active lifestyles? Will it help to provide access to safe, green and open spaces for activity? Will it help ensure the needs of growing populations? Will it contribute to reducing levels of deprivation across the boroughs?
11	Promote and enhance Sunderland and South Tyneside's culture and heritage	Will it conserve and enhance designated and non-designated cultural and heritage assets?
12	Create an integrated strategic road and public transport network within Sunderland and South Tyneside and to the wider region	Does it support highway and public transport infrastructure improvements? Will it reduce congestion and encourage sustainable transport?
13	Promote sustainable transport choices for employees, residents and visitors	Will it contribute to an increase in active travel choices? Will it encourage people to use low impact modes of transport?